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ATTORNEYS FOR DEFENDANT
TONNEVOLD REEFER 7 KS,
TONNEVOLD REEFER 4 KS, AND
O.T TONNEVOLD AS

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

EASTWIND MARITIME, S.A.

Plaintiff,

-against-

TONNEVOLD REEFER 7 KS,
a/k/a TONNEVOLD REEFER 2 KS,
a/k/a TONNEVOLD REEFER 4 KS,
a/k/a O.T. TONNEVOLD AS,
a/k/a TONNEVOLD OT,

Defendant.

08 Civ. 03292 (HB)

NOTICE OF MOTION

PLEASE TAKE NOTICE THAT upon the declaration of Jan Sigvart Walle dated April 18, 2008, and the accompanying Memorandum of Law in Support, and all pleadings heretofore had in this matter, Defendant Tonnevold Reefer 7 KS, Tonnevold Reefer 4 KS, and O.T. Tonnevold AS (collectively "Tonnevold"), will move this Court, before the Honorable Harold Baer, United States District Judge, at 500 Pearl Street, Courtroom 23B, New York, New York, on a date to be set by this Honorable Court, for an order pursuant to Rule E(7)(a) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, directing

(a) Plaintiff Eastwind Maritime S.A. to give security to Tonnevold for the damages demanded in Tonnevold's counter-claim within 10 days from the issuance of the order; and (b) directing such other and further relief as the Court may deem proper.

Dated: New York, New York
April 18, 2008

HOLLAND & KNIGHT LLP

By: 

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